

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

<b>CARY DALE KELLEY, individually and on behalf of all others similarly situated;</b>	§	
	§	<b>CAUSE NO. No. 3:13-cv-001</b>
	§	
<b>Plaintiff,</b>	§	<b>JURY TRIAL DEMANDED</b>
	§	
<b>vs.</b>	§	
	§	
<b>CAL DIVE INTERNATIONAL, INC.</b>	§	
	§	
<b>Defendant.</b>	§	
	§	
	§	

**DECLARATION OF TRAVIS TRAHAN**

Pursuant to 28 U.S.C. §1746, I, Travis Trahan, declare under the penalty of perjury that the following statements are true and correct:

1. My name is Travis Trahan. I am of sound mind, capable of making this Declaration, and personally acquainted with the facts stated herein. I am over the age of eighteen.

2. I am employed by Cal Dive International, Inc. ("Cal Dive") as Vice President of Administration. Cal Dive provides manned diving, derrick, pipelay and pipe burial services to the offshore oil and natural gas industry.

3. I have worked at Cal Dive for 15 years.

4. As Vice President of Administration, I am familiar with all hourly offshore positions, including Saturation Technicians ("SAT Techs").

5. The primary responsibilities of SAT Techs are to build, repair and maintain the saturation diving systems ("SAT systems") both on and offshore. A SAT system is a pressurized diving system that allows divers to remain at pressurized diving depths for extended periods of time during diving operations and after diving operations during the diver's decompression. The SAT system consists of two primary components: a pressurized vessel-mounted living chamber, and a diving bell that may be lowered to working depths. A team of two SAT Techs work

Affidavit of Travis Trahan  
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**EXHIBIT A**

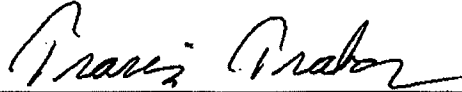
together monitoring the operation of the SAT system when dive operations are being conducted and/or when divers are decompressing. SAT Techs also assist with the manual operation of locking on and off the diving bell. SAT Techs work independently of the rest of the offshore project crew.

6. Only a portion of vessels operated by Cal Dive are equipped with SAT systems. SAT Techs only work on vessels that have a SAT system. Because they work only on vessels outfitted with a SAT system, SAT Techs do not work side-by-side with employees who work on vessels not equipped with a SAT system.

7. While SAT Techs do participate in pre-shift meetings when they are offshore, other hourly offshore employees, such as SAT divers, are not always required to attend the meetings. For example, if a SAT diver is confined to the SAT system chamber, he does not attend the pre-shift safety meetings.

8. Offshore employees who participate in pre-shift meetings are paid for attending the meetings. There has never been a policy at Cal Dive of NOT paying for pre-shift meetings.

9. The foregoing statements contained herein are true and correct to the best of my information and belief.



TRAVIS TRAHAN



DATE